



THE CITY OF NEW YORK
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November 11, 2017

BY ECF

Honorable Debra C. Freeman
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Lisa Snead v. City of New York, et al.,
16 Civ. 9528 (AJN)

Your Honor:

I am a Senior Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, representing defendants City of New York, retired Police Officer Gregory Lobianco and Sergeant Asa Barnes (“defendants”) in connection with the above-referenced matter. For the reason set forth below, defendants respectfully request: (1) a one-week extension of time, from November 3, 2017 to November 10, 2017, to provide a complete response to plaintiff; and (2) an extension of time, from November 20, 2017 to December 11, 2017, to complete discovery. Plaintiff’s counsel, Gabe Harvis, consents to this request.

During the October 3, 2017 phone conference, the Court instructed defendants to produce, among other things, the DAT Investigation Report, Prisoner Movement Slip, Central Booking Log and Overtime Records of the defendant officers or provide an affidavit of the search performed the records. On October 20, 2017, the Court granted defendants’ request for an extension of time until November 3, 2017, to produce aforementioned documents due to the personal reasons of the undersigned. (Docket No. 48) Since then, defendants have diligently worked to obtain most of the discovery necessary to comply with the aforementioned Court Order. However, a brief extension is needed to obtain the last remaining document necessary to comply with the October 3, 2017 Court Order. Therefore, defendants respectfully request an

extension of time, from November 3, 2017 to November 10, 2017, to comply with the Court Order dated October 3, 2017. The undersigned apologize for the late submission of this request.

Additionally, defendants, with consent of plaintiff's counsel, respectfully request an extension of time, from November 20, 2017 to December 11, 2017, to complete discovery. To date, the parties have engaged in extensive document discovery and have completed the deposition of the plaintiff. However, the request for the extension of fact discovery is necessitated to complete the depositions of the non-parties and defendants.

In light of the foregoing, defendants respectfully request an extension of time until November 10, 2017, to comply with the October 3, 2017 order and an extension of fact discovery until December 11, 2017.

Defendants thank the Court for its consideration.

Respectfully submitted,

/s/

Nana K. Sarpong
Senior Counsel

VIA ECF:

Gabriel Harvis, Esq.